

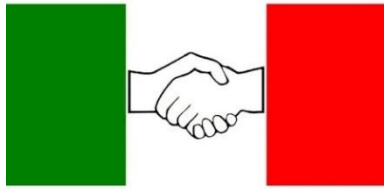
Southern California Energy Users Coalition Letter RE: Three Prong Test – OPPOSE



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HERMANDAD MEXICANA NACIONAL



CALIFORNIA LATINO LEADERSHIP INSTITUTE



CHAMBERS OF COMMERCE ALLIANCE
CCA
VENTURA & SANTA BARBARA COUNTIES



SANTA CLARITA VALLEY
ECONOMIC DEVELOPMENT CORPORATION



Strengthening the Voice of Business



Los Angeles/Ventura Chapter

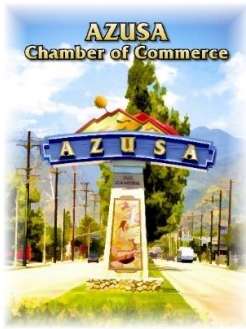


CALIFORNIA CENTER FOR PUBLIC POLICY



The Coalition of Labor, Agriculture & Business





July 31, 2019

The Honorable Michael Picker, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**RE: Proposed Decision Modifying the Energy Efficiency Three-Prong Test Related to Fuel Substitution –
OPPOSE**

Dear President Picker:

The undersigned organizations, which represent a coalition of concerned energy users and providers from across Central and Southern California, must respectfully oppose the Proposed Decision Modifying the Energy Efficiency Three-Prong Test Related to Fuel Substitution which will lay the groundwork for the electrification of all buildings in the state, regardless of the cost or impact to actual communities. While this regulation does not explicitly mandate electrification of all buildings, it is clear that this is the intent. This regulation will limit consumer choice of energy options and would misallocate utility ratepayer funds to measures that are not cost-effective.

This proposed decision would remove the second prong of the test, related to cost-effectiveness, with limited public input and no analysis of the costs or impacts of removing the cost-effectiveness test and an opportunity for affected individuals or organizations to fully gauge the impacts of changing a long-standing test. If adopted, this has the potential to remove or reduce ratepayer protections by masking the cost or inflating the benefit of new technologies which might impact energy affordability and grid reliability.

As our state is currently facing historic levels of homelessness and poverty, policies that would drastically increase the cost of building compliance and monthly utility bills, which negatively impact housing affordability, are misguided and regressive.

But it isn't just in the home where additional costs will be incurred. Similarly, businesses forced into all-electric commercial buildings would be faced with higher energy costs that they would likely pass through to consumers. The costs of goods and services will rise as a result, increasing the cost of living even further. These are policies that Californians simply cannot afford.

We are supportive of cost-effective methods to reduce greenhouse gas (GHG) emissions and protect our environment, but for these reasons above, this coalition must oppose the Proposed Decision Modifying the Energy Efficiency Three-Prong Test Related to Fuel Substitution and respectfully requests your **"NO"** vote.

Sincerely,

American Indian Chamber of Commerce
Antelope Valley Board of Trade
As You Like It Catering & Events
Asian Business Association Inland Empire
Azusa Chamber of Commerce
BizFed - Central Valley Business Federation
BizFed - Los Angeles County Business Federation
Black Chamber of Commerce of Orange County
Boys and Girls Club of Greater Ventura
Boys Republic
Brotherhood Crusade
Building Industry Association of Southern California – Baldy View Chapter
Building Industry Association of Southern California – Los Angeles/Ventura Chapter
Building Industry Association of Southern California – Orange County Chapter
Burbank Chamber of Commerce
California Business Roundtable
California Center for Public Policy
California Clean Distributed Generation Council (CCDC)
California Latino Leadership Institute
California Restaurant Association
California Small Business Alliance
Central City Association
Chambers of Commerce Alliance of Ventura & Santa Barbara Counties
Coachella Valley Economic Partnership
Coalition of Labor, Agriculture and Business (COLAB), San Luis Obispo
Community Services Employment Training
Congress of California Seniors
Covina Chamber of Commerce
Desert Valleys Builders Association
Duarte Chamber of Commerce
Food Share of Ventura County
Glendora Chamber of Commerce

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Greater Coachella Valley Chamber of Commerce
Greater Irvine Chamber of Commerce
Greater Los Angeles African American Chamber of Commerce
Greater West Covina Business Association
Hawthorne Chamber of Commerce
Hermandad Mexicana Nacional
Inland Empire Economic Partnership
Kern County
Kern County Taxpayers Association
Kheir Center
Latino Chamber of Commerce of Compton
Latino Food Industry Association
Latino Kids Health
Los Angeles Area Chamber of Commerce
Los Angeles Gateway Chamber
Mexican American Opportunity Foundation
NewStart Housing Corporation
Orco Block and Hardscape
Palm Desert Area Chamber of Commerce
Peabody Engineering
Precious Life Shelter
Proteus Inc.
PTS Advance
Regional Hispanic Chamber of Commerce
San Gabriel Regional Chamber of Commerce
San Gabriel Valley Economic Partnership
Santa Barbara County Taxpayers Association
Santa Barbara Technology and Industrial Association
Santa Clarita Valley Economic Development Corporation
South Orange County Economic Coalition
Southeast Churches Service Center
Southeast Community Foundation
Southwest Gas
The East Los Angeles Community Union (TELACU)
The Valley Economic Alliance
Tulare Chamber of Commerce
Tulare County Economic Development Corporation
Valley Economic Alliance
Valley Industry and Commerce Association (VICA)
Visalia Economic Development Corporation
Visalia Emergency Aid Council
Western States Financial